

From: [Charlotte Kacprowicz](#)
To: [Henry A Jones](#); [Alyssa Quijano](#); [adam@nmcivilrights.com](#); [laura@nmcivilrights.com](#); [dstruck@strucklove.com](#); [ddwells@kmwpc.com](#); [dmoulton@kmwpc.com](#)
Subject: RE: Telephonic discovery conference request - Youngers et al. v. CoreCivic et al., 1:25-cv-00012
Date: Tuesday, May 20, 2025 4:43:40 PM

Counsel,

Upon further review, the Court notes that it has not authorized discovery in this case. On February 5, 2025, the Court entered an Order Finding Good Cause to Delay Scheduling Order (Doc. 12) pending a ruling on the Motion to Remand (Doc. 10). If Judge Davenport denies the Motion to Remand, the Court will enter an initial scheduling order and set a scheduling conference to discuss and establish discovery parameters. Until such parameters are set by the Court, and in the interest of judicial economy, Judge Robbenhaar is not inclined to address informal discovery disputes, or consider discovery-related motions.

Best wishes,

Charlotte Kacprowicz

Term Law Clerk to Magistrate Judge John F. Robbenhaar

From: Henry A Jones <henry@nmcivilrights.com>
Sent: Tuesday, May 20, 2025 3:02 PM
To: NMDml_Magistrate Judge Robbenhaar's Chambers
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<robbenhaarproposedtext@nmd.uscourts.gov>
Cc: alexandra@nmcivilrights.com; sophia@nmcivilrights.com; 'Dan Struck'
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Subject: Telephonic discovery conference request - Youngers et al. v. CoreCivic et al., 1:25-cv-00012

CAUTION - EXTERNAL:

Dear Judge Robbenhaar:

I am writing to request a telephonic status conference to discuss discovery disputes in *Youngers et al. v. CoreCivic, et al.*, 25-CV-00012. Could you provide dates within the next few weeks of your availability?

The parties have been unable to resolve several of Defendants CoreCivic's and Lee's objections to Plaintiffs' written discovery requests, including Defendants assertion of attorney-client privilege in response to interrogatories about a spoliation letter, and Defendants' objections that certain requests about facility staff are overly broad and unduly

EXHIBIT 1

burdensome.

Sincerely,

Henry A. Jones
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505 364 3858

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